



Cook Inlet Authorizations

Cindi Godsey to: Karen Burgess, Hanh Shaw

02/07/2013 12:50 PM

I talked with Gerry this morning and he said that the files that EPA sent to them for the Cook Inlet facilities did not contain any authorization letters under the 2007 Permit. He is trying to deal with a similar situation to the one that Rick has outlined below and wanted the letters so he could see what discharges had been authorized under the Permit.

I found copies of the letters but they did not contain a list of the discharges authorized for each facility, just the permit numbers of the facilities authorized. I provided him with the letters but he may bring up the issue of not being sure of what is authorized as well as the files they received being incomplete in the upcoming meetings with EPA.

----- Forwarded by Cindi Godsey/R10/USEPA/US on 02/07/2013 11:45 AM -----

From: Richard Cool/R10/USEPA/US
To: "Linda Ward" <lward@hilcorp.com>,
Cc: "Brown, Gerry R (DEC)" <gerry.brown@alaska.gov>, Cindi Godsey/R10/USEPA/US
Date: 02/05/2013 07:49 AM
Subject: Granite Point Platform AKG315015

Hi Linda:

I am contacting you to ask for your assistance in clarifying discharge authorizations for Granite Point Platform, AKG315015. The request relates to the following three (3) discharges identified by their discharge number in the Cook Inlet General Permit (GP), AKG315000:

- 007-boiler blowdown
- 009-non-contact cooling water
- 015-produced water

For context, EPA's integrated compliance information system (ICIS) does not show existing discharge authorizations for these three waste streams. ICIS is EPA's primary NPDES data base used to track compliance for authorized NPDES discharges using data entered from permit applications and discharge monitoring reports (DMRs).

A review of recent past DMRs shows that Chevron and Hilcorp submit DMRs for 007-boiler blowdown and 009-non-contact cooling water. The recent Chevron (pre-2012) and Hilcorp DMRs (Jan-Oct 2012) I reviewed do not contain DMRs for 015-produced water.

Note, ICIS does not indicate any discharge authorization for 010-uncontaminated ballast water or 011-bilge water. These two discharge numbers are not an issue here and will not be discussed further.

Chevron's August 2003 NPDES reapplication for the Granite Point Platform did not contain discharge effluent data sheets for 007 and 009 but it did include an effluent data sheet for produced water, 015. This 2003 reapplication contains a Discharge Flow Diagram [Drawing No. P-F-0005, last revised August 12, 2003]. I cannot locate designations or discharge locations for 007-boiler blowdown and 009-non-contact **cooling** water on that 2003 diagram. I also note that the Fire Water Pumps (Diesel & Electric) icon in this 2003 diagram lacks any reference to "009" or to the Overboard designation "OB-20": two references that are subsequently found in the November 17, 2011 revised edition of Drawing No. P-F-0005 which was submitted with the Chevron December 2011 Notice of Intent (discussed below).

Chevron's August 2003 NPDES reapplication also contains a Discharge Location Drawing [Drawing No. P-F-0006, last revised August 12, 2003]. I cannot locate discharge locations for 007-boiler blowdown and 009-non-contact **cooling** water on that 2003 diagram.

The 2007 Cook Inlet GP, Section II.G., Table 7-B1, authorizes 015-produced water discharge from the Granite Point treatment facility and the Granite Point Platform. This GP provision appears consistent with similar discussion in the 2006 fact sheet, and the EPA response to comments.

I have not been able to locate any Region 10 NPDES Permits Unit letter(s) to Chevron identifying the specific discharge numbers that were authorized under the 2007 Cook Inlet GP. I cannot not locate any other documentation explaining why Chevron might have started submitting DMRs for 007-boiler blowdown and 009-non-contact **cooling** water and why it did not submit DMRs for 015-produced water.

Chevron's December 2011 Notice of Intent (NOI) (page 2 - Discharges, Check All That Apply) has *no check marks* for 007-boiler blowdown and 009-non-contact **cooling** water but it does have a check for 015-produced water. As noted above, this NOI contains a Discharge Flow Diagram [Drawing No. P-F-0005, last revised 11/17/11] with the Fire Water Pumps (Diesel & Electric) icon with references to "009" and Overboard designation "OB-20."

This December 2011 NOI submission also contains a Discharge Location Drawing [Drawing No. P-F-0006, last revised July 20, 2010]. I cannot locate discharge locations for 007-boiler blowdown and 009-non-contact cooling water on that 2010 diagram. However, the diagram does refer to firewater pump cooling water associated with OB-20.

During the September 2012 inspection, we believe that Mr. Marlowe discussed boiler blowdown discharges but only in the context of bringing on mobile diesel units for steam needs related to well workovers.

Summary/Preliminary Determinations. Subject to check and any clarification or documentation you can provide, here is a summary of what appears to be documented and some proposed next steps. I would appreciate your review of these summaries and proposed next steps and an opportunity to discuss them with you at your convenience once you have time to digest this material.

015-Produced Water: In accordance with the 2007 Cook Inlet GP and consistent with related documents (e.g. fact sheet, response to comments), Hilcorp is authorized to discharge produced water, 015.

Accordingly, both past and future DMRs are needed for 015.

007-Boiler Blowdown: I cannot locate records indicating that Chevron/Hilcorp were authorized to discharge boiler blowdown (BB). Chevron's December 2011 NOI shows no (then) current intent to obtain an authorization for discharge for 007.

For the first 10 months of 2012 (i.e. Jan-Oct), the submitted 007 DMRs show no discharge for each month.

Hilcorp should assess whether BB is a current discharge at the Platform and/or an anticipated future discharge that should get NPDES authorization, and apprise EPA and DEC of its findings. Depending on findings and if needed, discussions with DEC, Hilcorp may need to review the December 2011 NOI and making revisions deemed necessary and appropriate in order to ensure appropriate 007 authorizations are obtained.

009-Non-Contact Cooling Water: I cannot locate records indicating that

Chevron/Hilcorp were authorized to discharge non-contact **cooling** water (NCCW). Chevron's December 2011 NOI shows no (then) current intent to obtain an authorization for discharge for 009 despite the fact that the NOI submission contains a Discharge Flow Diagram [Drawing No. P-F-0005, last revised 11/17/11] with the Fire Water Pumps (Diesel & Electric) icon with references to "009" and Overboard designation "OB-20."

For the first 10 months of 2012 (i.e. Jan-Oct), the submitted 009 DMRs show discharges occurred in four (4) months. Despite the apparent inconsistent-labeled NOI-submitted diagrams and unchecked 2011 NOI, it appears the Platform has a NCCW discharge that needs NPDES authorization.

Hilcorp should consider reviewing the December 2011 NOI and making any revisions deemed necessary and appropriate in conjunction with DEC discussions in order to ensure appropriate 009 authorizations are obtained.

Again, please contact me once you have time to digest this material to discuss this email, any clarifications you might have and proposed next steps. Thank you in advance for your cooperation.

Rick **Cool**
NPDES Compliance Unit
US EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-133
Seattle, WA 98101

Phone: (206) 553-6223
Fax: (206) 553-1280